Note: Many Sections of Article 7 and all of Article 7.5 are not transferred to these SOP regulations because they refer to mobilehome installations and tiedowns.

Adopt Section 2320.

Subsection (a) is added to clarify that whenever a MH-unit is to be installed in a Special Occupancy Park for the operation or maintenance personnel, it must be installed in accordance with Chapter 2 of this division. This is necessary because there is no MH-unit installation or tiedown requirements in this chapter due to the very limited numbers of MH-units in Special Occupancy Parks and it is unnecessary to duplicate the requirements

Subsection (b), previously subsection 1634(b), is relocated to this subsection because it relates to the administration and enforcement of existing installation and construction applications. It is amended to clarify that it applies to "existing construction", installations, and connections, which are not required to conform to current regulatory requirements as long as they are not substandard. Although the subsection did apply to existing installations and connections, this was not stated specifically. This amendment now makes explicit the implied intent of the subsection by including a list of possible existing construction to clarify the possibilities for the regulated public. Finally, it is amended by replacing the term "unsafe or unsanitary" with "substandard" to maintain consistency of language:

Adopt and Amend Section 2774 as Section 2322.

The title is amended by replacing the word "Tongue" with "Towing Hitch" because it is the common term now in use for the attachment of the unit to the towing vehicle and better clarifies the contents of the section.

This section is amended by replacing the word "tongue" with "hitch" because it is the common term now in use for the attachment of the unit to the towing vehicle and by requiring the removed hitch to be readily available and capable of being reinstalled. It is also amended by adding the text "The wheels, vehicle axles, and their assemblies shall not be removed" This is necessary because as a vehicle a recreational vehicle must remain capable of being towed.

Adopt and Amend Proposed Section 1324 as Section 2324.

The title is amended by adding the word "Installation" to clarify the actual contents of this section and deleting "required": because it is unnecessary..

Subsection (a) is amended by adding reference to camping cabins, when they are installed in a park, and deleting references to mobilehomes. This is necessary because camping cabins require inspection for the installation, electrical connections, required smoke detectors installations and disabled access and for verification that no plumbing has been installed as required by statute (HSC 18862.5). The reference to mobilehome installations are referred to chapter 2 of this division.

Subsection (b) is amended by replacing the text referring mobilehome installation permit requirements to article 1 with text stating that a permit is not required to locate a recreational vehicle in a park. This is necessary because mobilehome installations are covered in chapter 2 and because recreational vehicles are vehicles they are not installed.

Adopt Section 2326.

This section is added to clarify the requirements for camping cabins contained in statute (HSC 18862.5 and 18871.11)

Subsection (a) is added to identify where the laws for camping cabin construction and installation are located. This is necessary because these are new requirements and many contractors and park operators are not aware of their location.

Subsection (b) is added to ensure that the load bearing capacity of the camping cabin roof is capable of supporting the required loads for the location where it is installed.

Subsection (c) is added to clarify the requirements for the installation of a smoke detector. This is required by statute (HSC 18871.11) and the reference to the California Building Code is specified because it is the common, available and statewide accepted standard for smoke detector installation.

Subsection (d) is added to clarify the requirement in statute (HSC 18862.5) that limits the size of a camping cabin to 400 square feet. It is further defined to include "built-in porches or stairways contained within the original cabin footprint" because the cabin must be "relocatable" (HSC 18862.5) and any structure attached to the original floor would be included in the size measurement.

Subsection (e) is added to clarify that if a camping cabin is required to meet the accessibility requirements, the requirements are contained in chapter 11B of the California Building Code for parking, the path of travel and the access up to the camping cabin.

Subsection (f) is added to clarify the requirement in statute (HSC 18862.5) that a camping cabin be relocatable. The requirement that it be readily relocatable is necessary to limit the amount of work needed to move the cabin.

Subsection (g) is added to identify the location in this chapter of the requirements for accessory structures. This is to clarify which requirements apply to camping cabin accessory structures.

Subsection (h) is added to prohibit the use of fuel burning appliances in camping cabins. This is necessary because this requirement is specified in statute and because only electrical heating appliances are permitted (HSC 18862.5). It is added here for clarity.

Subsection (i) is added to prohibit the use of plumbing in camping cabins. This is necessary for clarity because plumbing is specifically prohibited by statute (HSC 18862.5).

Adopt and Amend Existing Section 1328 as Section 2328.

This section is amended by deleting the specific language for utility requirements and adding text specifying that "when" utilities are provided they must comply with the requirements of this chapter. This is necessary because utilities are not required for lots in special occupancy parks, however if they are provided, they must comply with these requirements. The specific text is deleted because the requirements for each type of utility is already defined in there respective sections.

Adopt and Amend Existing Section 1330 as Section 2330.

The title of this section is amended by adding the words "Unit separation and setback requirements within parks" because this provides an accurate description of the actual contents of this chapter.

Throughout this section, the word "mobilehome" is struck, or is exchanged with the word "unit", when no other descriptor exists. This is necessary so the requirements can apply to "unit" as defined in Section 2002, or expanded to apply to any park rather than solely to mobilehome parks. The words "a minimum of" are replaced by "not less than" because it is more precise. The words "or eave overhang" are added after the word "projections" to include them and indicate they are separate and can have individual requirements.

The first sentence is struck because the title of the section renders it unnecessary.

Old subsection (a) is struck because it is unnecessary.

New subsection (a) is not new information; it is created from previous subsection (a)(2), and is amended editorially, and as explained above. The text "constructed prior to September 15, 1961, no mobilehome" is deleted because it refers to regulatory changes to mobilehome parks that became effective on that date. They were never applicable to special occupancy parks. The words "of parks" replaces "thereof" because it is more descriptive. The word "no" is replaced by the word "not" and the word "to" replaces "from" to be grammatically correct.

Old subsection (a)(1) is deleted except the last sentence and the exception. This is necessary because it refers to separations specific to mobilehome parks and is not applicable to special occupancy parks.

Subsection (b) is the last sentence and the EXCEPTION note in existing subsection (a)(1). It is amended by adding the text "when the roadway is located within the park" for clarity. This is necessary to differentiate when this exception applies and identify that this exception does not apply to public roadways.

Old subsection (a)(3) is deleted because the provisions of this section are covered in subsection (c).

Old Subsections (b) is deleted because it refers to separations for units outside of parks. This is necessary because occupancy requirements for RVs outside of parks are under the authority of the local jurisdiction.

Subsection (c), is amended by deleting the text "the projections may intrude into the distance required for separation or setback provided that". This is necessary because originally these provisions referred to the separation requirements for mobilehomes. Those separations are greater than six feet. Because special occupancy parks permit a minimum of six feet of separation, combustible materials may not protrude into this area. A minimum six foot separation from combustible materials on adjacent lots is a long standing provision of the applicable regulations for special occupancy parks and all building standards and fire codes. The remainder of the amendments clarifies this separation by adding references to include eaves and overhangs, and combustible accessory buildings or structures. Additionally, the exception from subsection (b) permitting placement up to a roadway is added for clarity.

Subsection (d) is added to specify the location for the required marking of lot lines and its specifications. This is necessary because the lot lines must be marked in order to determine the actual location of the structures in relation to it.

Subsection (e) is added as reference to the section of this chapter identifying location requirements for accessory buildings or structures or building components.

Old subsection (d) is deleted because it refers to separations for units outside of parks. This is necessary because occupancy and separation requirements for RVs outside of parks are under the authority of the local jurisdiction.

Adopt and Amend Section 2776 as Section 2333.

This section is relocated from Subchapter 2 of the existing regulations and amended by adding reference to camping cabins and deleting the text "attached with underpinning" and "to the ground". This is necessary because statute (HSC 18862.5) requires camping cabins to be relocatable and the deleted text is clarified by adding "affixed to a lot" or "installed on a foundation system" because approved foundation systems are not always attached to the ground.

Adopt and Amend Proposed Section 1334 as Section 2334.

The title of this section is amended by adding the words "Accessory Structure" and "Piers and Footings". This is necessary so the title accurately reflects the contents of the section.

Subsection (a) is amended by striking the word "supports" and adding the word "piers" to use common terminology for reader understanding. It is also amended by adding the text "shall be constructed of rust resistant materials or treated to resist rust" because metal piers are located in close proximity to the ground, which contains moisture that accelerates the rusting of metal. Metal piers need to be treated to retard rust to maintain their load bearing capabilities. Additionally, it is amended by deleting references to outdated regulation titles, and by adding currently used titles and including the chapter references. This is necessary so the reader can view the accurate reference. The words "support structures" are deleted because the term is deleted throughout this chapter. Since its original use differing engineering understanding and methods for foundation systems have negated is necessity. The term "accessory structure" is added because these requirements apply to supports for permitted accessory structures. This subsection is also amended editorially.

Subsection (b) is added to establish testing criteria and guidelines for conducting the tests for other than concrete block piers. This is necessary because there are currently no criteria for testing and no tests for verification of the manufacturers claimed load capacity at this time.

Subsection (b)(1) is added to provide specific guidelines for accurate and impartial selection of supports to be tested.

Subsection (b)(1)(A) is added to ensure the test is performed on completely assembled supports.

Subsection (b)(1)(B) is added to determine the criteria for testing and measurement of the support to its failure point.

Subsection (b)(1)(C) is added to determine the maximum allowable load on the tested assembly. It is a common engineering practice to use one-third of the average maximum tested load on a structure, as a standard structural safety allowance in relation to its failure rate.

Subsection (b)(2) is added to specify that the tests are required on all types, and heights of supports.

Subsection (c) is added to establish requirements for labeling and listing tested piers, other than concrete block. Having verifiable load capacity on permanent labels will provide for consumer protection and safety.

Subsection (c)(1) is added to specify that only agencies approved by the department may list pier tests. This is necessary to provide consistent quality of the test and listing results.

Subsection (c)(1)(A) is added to provide monitoring of the manufacturer by the listing agency.

Subsection (c)(1)(A)(i) through(c)(1)(A)(iv) and (c)(1)(B) are added to define the specific criteria for the audit report for the monitoring of the manufacturer and require the report be provided annually. This assures verification of the testing program and procedures.

Subsection (c)(2) through (c)(2)(E), are added to provide guidelines for labeling of the tested and approved piers. This gives any user of the support or inspector the ability to verify the pier's safe load capability.

Subsection (d), previously the first paragraph of subsection (b), is amended by replacing the words "submitted to" with "approved by". This is necessary because simple submission of the information does not ensure approval by the enforcement agency. The last portion of this subsection is subdivided because this subsection covers soil conditions and that new subsection covers footing size.

Subsection (e), is the previous second paragraph of subsection (b). The original subsection (b) is subdivided because this subsection covers the footing size. Te previous section covers soil conditions. It is also amended editorially.

Table 1334-1 "Footing Areas" is deleted because it is common information available by simply multiplying the length of a footing by its width and is unnecessary.

Subsection (e)(1) has no amendments.

Subsection (e)(1)(A) is amended editorially.

Subsection (e)(1)(B) through (D) have no amendments.

Subsection (e)(2) is amended by correcting a typographical error in the minimum 28-day compressive strength of the concrete from 200 lbs per sq inch to 2500 pounds per sq inch. This is necessary to eliminate misunderstanding as to the strength of the concrete. 2500 pounds per square inch compressive strength is a minimal amount for non-reinforced concrete and is consistent with the requirements of the California Building Code. Additionally, foundation concrete below 2500 pounds per square inch does not require testing or certification, but is adequate when used for support footings.

Subsection (e)(3) has no amendments.

Subsection (f), previously subsection (c), is amended by replacing the word "piers" with the word "supports", and by adding the words "and footings" to include them in the requirements and use common terminology. The addition of the words "over 1/3rd the area of" and "as measured from the center of the footing" is necessary because metal support piers have a contact area of less than one square foot (this varies with the pier height) and footings can be up to 30 inches in length. When the pier is placed on the footing, the footing must be of sufficient rigidity not to deflect or bow when this type of pier is placed upon it. The addition of the wording requiring specific assembling of contact pads with cross pads on top is necessary to assure that the support will be stable, distribute the load, and be sufficiently rigid to provide adequate support for the unit. The last sentence is struck because it is covered more thoroughly in subsections 2334 (b) and (c).

Subsection (g) is added to assure that when wood footings are stacked, they are secured together to prevent movement or shifting during any type of seismic, wind or other condition. This is necessary so that when wood footings are stacked they essentially become one unit and are not permitted to shift.

Old subsection (d) is deleted because it refers to MH-unit supports and is not applicable to accessory structures. Accessory structure supports are typically over 36 inches in height, but the necessary lateral support for MH-unit supports is not required.

<u>Sections 1334.1 through 1336 of the MP regulations are not relocated to these SOP requirements because they refer to Manufactured home installation and tiedowns and are not applicable to this chapter.</u>

Adopt and Amend Section 1350 as Section 2337.

Section 1350 is relocated to new section 2337, to place the requirements for load bearing supports, and their subsequent inspection, in close proximity to related requirements and to keep them in succession in the regulations.

This section is amended throughout, by adding the words "accessory structure" to replace the word "mobilehome" because these requirements originally referred to mobilehomes however, the provisions of this section now only apply to accessory structures. The word "area" was exchanged for the word "space" and the word under" was exchanged for the word "beneath" as editorial changes.

Subsection (a) is added to specify that skirting cannot be installed until the underfloor installations has been inspected. This is necessary because it is not possible to inspect all the supports and their attachments when it is hidden by skirting.

Subsection (b) is added to specify the masonry walls cannot be installed until the underfloor had been inspected, unless the masonry wall is required to provide perimeter support to the accessory structure. This is necessary because the inspection of the support

system and connections could be impeded by the wall and could only be permissible if the wall was a structural element of the support system.

Adopt and Amend Proposed Section 1344 as Section 2344.

Subsection (a) is amended by deleting the first sentence because it refers to manufactured home installations and by replacing the words "beneath" with "between" and "a support structure" with "accessory structure". This is necessary because it is a more accurate description of the measurement points and this section refers to clearances beneath accessory structures. A distance of 12 inches is necessary for inspection and the prevention of termites and rot.

Subsection (b) is added to limit the finished floor of camping cabins to 18 inches. This is necessary because a camping cabin must be relocatable and there are no installation specifications or supports approved for camping cabins. If an installer devises a support for a camping cabin that exceeds 18 inches, an alternate approval may be obtained in accordance with section 2016 of this chapter.

Adopt and Amend Proposed Section 1344 as Section 2344.

This section is amended throughout, by adding the words "accessory structure" to replace the word "mobilehome", because the provisions of this section only apply to installed accessory structures not mobilehomes.

The title of this section has been changed to "Skirting Design and Construction" because it is a more accurate description.

Subsection (a) is amended by adding language to specify the minimum access opening under the unit, and that there can be no obstructions such as pipes or ducts, impeding access. This language is consistent with the provisions contained in the California Building Code, section 2306.3. The language allowed any dimensioned opening, and that required the access to be located within 20 feet of the lot utility connections was struck to maintain consistency with the accepted building standards and to allow for variation on the locations.

Subsection (b) is amended by striking the word "attached" because accessory structures are not generally permitted to be attached, or transmit loads to the unit. Language was added requiring the ventilation openings to be installed on the two opposite sides of the structure "along the greatest length of the unit". This is necessary because the previous language would allow vents only on the shorter ends of the unit, which would not provide the required cross ventilation necessary beneath unit. The word "installed" is added to be grammatically correct.

Subsection (c) is amended by striking the existing language and adding language that brings the requirements for wood and wood siding forward from the California Building Code, Title 24 when there are no siding manufacturer's installation instructions. This is necessary to provide instructions for the reader, in the absence of instructions from the material manufacturer. The added language requiring that all wood products used in underfloor enclosures nearer than six inches to the soil, are required to be treated wood, or wood of natural resistance to decay is not new, but is the existing language that was struck. The use of the traditional strikeout and underline format would have been very confusing for the reader, so it was struck and then added back in its entirety.

Adopt and Amend Proposed Section 1352 as Section 2352.

This section is amended throughout, by replacing the word "mobilehome" with "recreational vehicle or camping cabin", unless they are not necessary, and then the word "mobilehome" is deleted and not replaced. This is necessary because this section only applies to the electrical feeders for these units. Additionally, this section is amended by adding existing subsections 1634(d) for the reason provided below.

Subsection (a) is amended by adding the word "lot" to describe the service equipment and distinguish it from the park's electrical service.

Subsection (a)(1) is amended by adding the words "power supply" because it is current accepted terminology as referenced in the Electrical Code. The word "set" is stricken for clarity because it is an old term that referred to travel trailers. The word "approved" and "or recreational vehicle" is added because the cord must be approved for its use by the listing agency. The word "mobilehome" is kept in this instance, because the power supply cord testing industry also uses the word "mobilehome" to label power supply cords.

Old Subsection (b) is deleted because it referred to specifications for mobilehomes.

Subsection (a)(2) is existing subsection (c) and is amended editorially and as mentioned above and the text "For mobilehome use - 40 amperes" or "For mobilehome use - 50 amperes" as appropriate. Except: A mobilehome, equipped with an existing power supply cord not listed for mobilehomes may have its use continued provided:" is deleted because it specifically refers to mobilehome power supply cords.

Old Subsection (c)(1) is amended by deleting the first part of the subsection to editorially connect with the previous subsection.

Subsection (b) is existing subsection (c)(2) and is amended by striking language that would be duplicative of new language being added, and by adding language that specifies conformance with the male attachment plug provisions of the California Electrical Code.

Old Subsections (c)(2)(A) through (c)(3)(D) are repealed because the specifications referenced in the text is more thoroughly defined in the referenced California Electrical Code and is unnecessary and/or they referred specifically to mobilehome power supply cords.

Old Subsection (d) through (e)(2) are deleted because it specifically refers to mobilehome power supply cords and their connections.

Subsection (c), previously subsection (e)(2) is amended by deleting the text "If the manufacturer's installation instructions are not available" because recreational vehicles are not "installed" and have not installation instructions. It is also amended as mentioned above.

Subsection (d), previously subsection (e)(3), is amended by updating to the correct reference for the currently accepted electrical standard, the California Electrical Code. This is necessary to update the reference from the outdated 1978 edition of the electrical code. It is also amended as mentioned above.

Old Subsection (f) is deleted because it is unnecessary. The type of cords approved for use on a recreational vehicle are tested and approved to be in contact with the ground.

Old Subsection (g) is deleted because it duplicates the provisions of Section 1188 with regard to the safety of the equipment installed.

Subsection (e), previously subsection (h), is amended by deleting the text "mobilehome for each dwelling" because recreational vehicles not multi-unit dwellings and by deleting the remainder of the subsection because it specifically refers to mobilehome power supply connections.

Subsection (f) is renumbered subsection 1634(d). This is necessary to consolidate related sections because this provision addresses power supply cords. There are no other amendments.

Adopt and Amend Proposed Section 1354 as Section 2354.

The title and the subsections of this section are amended by adding the word "Unit" to replace the word "mobilehome", unless the inclusion of the word "mobilehome" is not necessary, then it is struck without replacement. This is necessary because the provisions of this article apply to recreational vehicles.

Subsection (a) is amended by exchanging the word "listed" with the word "approved" and adding the words "listed for its intended use". This is necessary to ensure that connectors listed for use with gas, are used in their proper application. It is also amended by striking the outdated reference to the 1979 Uniform Plumbing Code and adding the reference to the

currently adopted California Plumbing Code. This is necessary to update the reference from the outdated 1979 edition of the plumbing code. The remainder of the subsection is struck because the requirements can be found in the referenced California Plumbing Code.

Old subsections (b) and (c) are repealed because they refer specifically to manufactured home gas piping systems. The department is not permitted by statute to adopt or enforce construction standards for recreational vehicles.

Subsection (b) is renumbered subsection (d) because of the repealed text, and is amended as mentioned above.

Adopt and Amend Proposed Section 1356 as Section 2356.

The title and this section are amended by replacing the word "Mobilehome" with "Unit". This is necessary because the provisions of this article refer to a "unit" as defined in section 2002 of this chapter.

Further, this section is amended by adding language that specifies the flexible connectors for water supply, be "approved for potable water". This is necessary to allow a flexible connection in the event of movement of the home, and for the safety of the occupants, the connector is approved for drinking water.

Adopt Section 2358.

The title is amended by striking the word "mobilehome" and "connector" and adding the word "unit" because the section includes recreational vehicles and to accurately reflect the contents of this section which covers drain connectors. This is necessary because the provisions of this pertain to units as defined in section 2002 of this chapter.

Subsection (a) is not new; it is renumbered subsection 1680(b). It is amended by adding language that includes fittings for drain connectors. The requirement that the connectors and fittings be listed and approved for drain and waste replaces the vague language specifying the hose be flexible. This is necessary to assure consistent quality of materials and to reduce the possibility of sewage leaks with the connection. The new text allows a Recreational Vehicle owner a choice of any piping provided it is listed and approved for drain and waste usage.

Subsection (b) is subdivided from existing subsection 1680 (b) above because this portion of this subsection refers to recreational vehicles that are located in parks year round or do not have holding tanks (self contained). It is amended by striking "occupied as a residence or" because when a unit is located in a park year round it is not necessary for the unit to be actually occupied year round. Drain connectors for recreational vehicles located year round in a park are exposed to physical damage, ultraviolet deterioration and other conditions that affect the use and durability of the materials. The provisions contained in Section 1358 are incorporated into this subsection. This is because the materials for use with manufactured homes as specified in Section 1358 have proven to be a safe, durable material for drain connections. It is also amended by adding the phrase "or units with plumbing that are not self contained" because some recreational vehicles, such as park trailers, are not self contained in that they do not have holding tanks for the storage of wastes. These non-self contained units have the same drain connection as a manufactured home and a proven, safe, durable drain connector is the type specified in section 1358.

Subsection (c) is not new; it is renumbered subsection 1680(c). It is relocated to include it in this section of drain connector requirements. It is amended by deleting the requirement specifying the angle of grade on the connector. This is necessary because many recreational vehicles only use the drain connector to discharge the contents of the holding tank when the tank is full and not as regular drainage piping. When this is done, the connector contents are siphoned from the piping and it is not necessary to maintain the gradient of normal drainage piping. The other amendments are editorial.

Subsection (d) is relocated existing subsection 2504(d) and the exception following section 2504. It is amended by adding the text "gastight, unless discharged" to provide an alternative for waste disposal and to incorporate the exception allowing "approved closed, vented containers". The text "EXCEPTION: When the drain from plumbing fixtures, other than a toilet, discharges" is deleted because it is no longer necessary. There are presently listed and approved containers suitable for solid wastes.

Adopt and Amend Proposed Section 1360 as Section 2360.

Subsection (a) is deleted because it specifically applies to mobilehomes.

Subsection (b) is amended by deleting the first half of the section because it specifically applies to mobilehomes. The text "if the unit is not pre-wired for" is added to allow an airconditioner to be connected to a recreational vehicle because not all units can accommodate the additional electrical requirements of air conditioning equipment. The term "shall" replaces "may" because the department does not have the authority (HSC 18027.3) to modify or enforce standards for recreational vehicles and any additional electrical load must be applied to the lot service not to the unit. Finally, language is added that a permit to construct will be required if any alteration of the lot electrical service is planned. This is necessary because the lot service cannot be altered without first obtaining a written construction permit from the enforcement agency.

<u>Sections 1362, 1366, 1368 and all of Article 7.5 are not relocated to this chapter</u> because they only apply to mobilehome/manufactured home installations.